

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**NICHOLAS LAWRENCE GUILFOYLE,
a/k/a “Whiteboy,”**

Defendant.

Case No. 23-CR-235-GKF-3

**Motion for One-Level Reduction
for Acceptance of Responsibility**

The government moves to reduce the defendant's total offense level by one additional level for early acceptance of responsibility under United States Sentencing Guidelines § 3E1.1(b). In support of its motion, the Government states that the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the Government to avoid preparing for trial and permitting the Government and the Court to allocate their resources efficiently.

Accordingly, the Government asks this Court to decrease defendant's offense level by one additional level, as provided for in United States Sentencing Guideline § 3E1.1(b).

Respectfully submitted,

CLINTON J. JOHNSON
UNITED STATES ATTORNEY

/s/ Joel-lyn A. McCormick

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Certificate of Service

I hereby certify that on the 28th day of August, 2024, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

Stephen Layman
Defense Counsel

/s/ Joel-lyn A. McCormick

Joel-lyn A. McCormick
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